

RACHELE R. BYRD (190634)
**WOLF HALDENSTEIN ADLER
 FREEMAN & HERZ LLP**
 750 B Street, Suite 1820
 San Diego, CA 92101
 Telephone: 619/239-4599
 Facsimile: 619/234-4599
 byrd@whafh.com

*Interim Class Counsel for the
 Consumer Plaintiffs*

BENJAMIN J. SIEGEL (SBN 256260)
**HAGENS BERMAN SOBOL
 SHAPIRO LLP**
 715 Hearst Avenue, Suite 202C
 Berkeley, CA 94710
 Telephone: (510) 725-3000
 Facsimile: (510) 725-3001
 bens@hbsslaw.com

*Interim Class Counsel for the
 Developer Plaintiffs*

PAUL J. RIEHLE (SBN 115199)
 paul.riehle@faegredrinker.com
**FAEGRE DRINKER BIDDLE &
 REATH LLP**
 Four Embarcadero Center, 27th Floor
 San Francisco, CA 94111
 Telephone: (415) 591-7500
 Facsimile: (415) 591-7510

YONATAN EVEN (*pro hac vice*)
 yeven@cravath.com
CRAVATH, SWAINE & MOORE LLP
 825 Eighth Avenue
 New York, New York 10019
 Telephone: (212) 474-1000
 Facsimile: (212) 474-3700

Attorneys for Plaintiff Epic Games, Inc.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

EPIC GAMES, INC.,
Plaintiff, Counter-defendant,
 v.
 APPLE INC.,
Defendant, Counterclaimant.

Case No. 4:20-cv-05640-YGR-TSH

IN RE APPLE IPHONE ANTITRUST
 LITIGATION

Case No. 4:11-cv-06714-YGR-TSH

DONALD R. CAMERON, *et al.*,
Plaintiffs,
 v.
 APPLE INC.,
Defendant.

Case No. 4:19-cv-03074-YGR-TSH

**DECLARATION OF YONATAN EVEN
 IN SUPPORT OF PLAINTIFFS' JOINT
 ADMINISTRATIVE MOTION TO FILE
 UNDER SEAL THE JOINT DISCOVERY
 LETTER BRIEF REGARDING APPLE
 DEPOSITIONS AND SUPPORTING
 EXHIBITS**

Judge: Hon. Magistrate Thomas S. Hixson

1 I, Yonatan Even, declare as follows:

2 1. I am a partner at the law firm of Cravath, Swaine & Moore LLP, and am
3 one of the attorneys representing Epic Games, Inc. in the above-captioned actions. I am admitted
4 to appear before this Court *pro hac vice* in *Epic v. Apple*.

5 2. I submit this declaration pursuant to Civil Local Rules 7-11(a) and 79-5(d)-
6 (e) in support of Plaintiffs' Joint Administrative Motion to File Under Seal the Joint Discovery
7 Letter Brief Regarding Apple Depositions (the "Joint Discovery Letter Brief") and Supporting
8 Exhibits 1-12 and A-D. The contents of this declaration are based on my personal knowledge.

9 3. Portions of the Joint Discovery Letter Brief and its exhibits contain
10 information that Defendant Apple Inc. ("Apple") has designated as "CONFIDENTIAL" or
11 "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" under the protective orders in the
12 above-captioned actions. (*Epic Games, Inc. v. Apple Inc.*, No. 20-cv-05640-YGR-TSH, ECF
13 No. 112; *In re Apple iPhone Antitrust Litigation*, No. 4:11-cv-06714-YGR-TSH, ECF No. 199;
14 *Donald R. Cameron, et al. v. Apple Inc.*, No. 4:19-cv-03074-YGR-TSH, ECF No. 85.) Apple
15 requested that the entire filing be sealed.

16
17 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing
18 is true and correct and that I executed this declaration on December 15, 2020 in New York, NY.
19

20 /s/ Yonatan Even

21 Yonatan Even
22
23
24
25
26
27
28